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Attorney for the Debtor, Jocelyn Wall

IN RE:	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
	:	
	:	CHAPTER 13 CASE NO. 16-28896/RG
Jocelyn Wall,	:	
	:	NOTICE OF MOTION TO APPROVE
	:	MODIFICATION OF MORTGAGE
	:	PAYMENT WITH MR. COOPER
	:	
Debtor	:	
	:	
	:	HEARING DATE:

To: Marie Anne Greenberg, Trustee
30 Two Bridges Road
Suite 330
Fairfield, NJ 07004

PLEASE TAKE NOTICE that on October, 2017 at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorney for the debtor will move before the United States Bankruptcy Court, Honorable Rosemary Gambardella, U.S.B.J., US Courthouse, Martin Luther King Jr. Federal Courthouse, 3rd Floor, 50 Walnut Street, Newark, New Jersey, for an Order authorizing the debtor to modify the mortgage payments with Mr. Cooper for the principal residence located at 9 Woodsedge Avenue, Budd Lake, New Jersey.

TAKE FURTHER NOTICE that the facts the movant relies on, as set forth in the accompanying certification, and the basis for relief, do not present complicated questions

of fact or unique questions of law. Pursuant to Local Bankruptcy Rule 9013-1, it is hereby submitted that no brief is necessary in the Court's consideration of the within motion.

TAKE FURTHER NOTICE that the within Notice of Motion shall be deemed uncontested unless responsive papers are filed in accordance with Local Bankruptcy Rule 9013-1.

/s/ Joan Sirkis Warren

JOAN SIRKIS WARREN, ESQ.

Dated:
9/26/17